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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,)
Plaintiff,)
vs.)
CORBIN REYNOLDS,)
Defendant.)
No. 2:16-cr-0284-RFB
GOVERNMENT'S MOTION TO
DISMISS CRIMINAL
INDICTMENT PURSUANT TO
FEDERAL RULE OF CRIMINAL
PROCEDURE 48(a)

COMES NOW the United States of America, by and through STEVEN W. MYHRE, Acting United States Attorney, and SUSAN CUSHMAN, Assistant United States Attorney, and respectfully seeks leave of court pursuant to Federal Rule of Criminal Procedure 48(a) to dismiss without prejudice the Criminal Indictment filed on October 5, 2016, (Doc. # 10) as to defendant Corbin Reynolds in the interest of justice.

The following is alleged in support of this motion:

1) On October 5, 2016, a federal grand jury returned a single-count indictment charging the defendant with Possession of a Firearm by a Prohibited Person in violation of violation of 18 U.S.C §§ 922(g)(1) and 924(a)(2). (Doc. # 10). The date of the alleged offense occurred on or about September 21, 2016.

2) On October 25, 2016, a federal grand jury returned a nine count indictment charging Corbin Reynolds and six co-defendants with Conspiracy to

1 Distribute Methamphetamine in violation of 21 U.S.C. §§ 846, 841(a)(1) and
2 (b)(1)(A)(viii) and related offenses (Case 2:16-cr-0296-JAD-PAL, Doc. # 10). Counts 8
3 and 9 charge REYNOLDS with drug trafficking crimes that occurred on or about
4 September 21, 2016.

5 3) On April 11, 2017, a federal grand jury returned a 10-count
6 superseding indictment in Case No. 2:16-cr-0296-JAD-PAL. (Doc. # 109). The
7 superseding indictment added Count 10, which charged REYNOLDS with Possession of
8 a Firearm by a Prohibited Person in violation of violation of 18 U.S.C §§ 922(g)(1) and
9 924(a)(2). This is the same offense that the defendant is charged with in Case No. 2:16-
10 cr-0284-RFB. Therefore, the government respectfully seeks leave of the court to dismiss
11 the Criminal Indictment filed in 2:16-cr-0284-RFB.

12 4) The defendant is in custody on the captioned matter.

13 5) The defendant is also in custody on Case No. 2:16-cr-0296-JAD-PAL
14 pursuant to a detention order issued on November 3, 2016 (Doc. # 53). The defendant
15 should remain in custody on Case No. 2:16-cr-0296-JAD-PAL.

16 DATED this 25th day of April, 2017.

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18 ORDER
19 IT IS SO ORDERED.

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21 

22 RICHARD F. BOULWARE, II
United States District Judge
DATED this 25th day of May, 2017.

Respectfully Submitted,
STEVEN W. MYHRE
Acting United States Attorney

23 /s/ *Susan Cushman*

24 SUSAN CUSHMAN
Assistant United States Attorney

1 **CERTIFICATE OF ELECTRONIC SERVICE**

2 This is to certify that the undersigned has served counsel for Defendant with the
3 foregoing by means of electronic filing.

4 Dated this 25th day of April, 2017

5 */s/ Susan Cushman*

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7 SUSAN CUSHMAN
8 Assistant United States Attorney

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